

**IN THE UNITED STATES COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:17-cr-154 (TSE)
)	
KEVIN MALLORY,)	Trial: May 15, 2018
)	
Defendant.)	

DEFENDANT’S PROPOSED VOIR DIRE QUESTIONS

The defendant, Kevin Mallory, by counsel, respectfully submits the following proposed voir dire questions to be asked of prospective jurors during jury selection in this case, in addition to the Court’s standard voir dire questions:

- 1) Have you, or any member of your family or a close friend, ever applied for or held a security clearance relating to the handling of classified information from an agency of the United States government?
- 2) Have you, or any member of your family or a close friend, ever worked in the United States Intelligence Community, either through employment with an agency of the United States government or through employment with a private company to perform work for the United States Intelligence Community?
- 3) If the defense presented at trial is that the defendant did not act with criminal intent, would you expect and want the defendant to testify about his intent?
- 4) Have you, or any member of your family or a close friend, ever worked in law enforcement, or for any federal, state or local government agency involved in the enforcement of criminal law?
- 5) Do you speak or understand Mandarin Chinese?

- 6) Have you done business with Chinese companies or with the Chinese government or any other entities in China, or have you traveled to China for the purpose of conducting business there?

Respectfully Submitted,

KEVIN PATRICK MALLORY

By Counsel,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

John Gibbs, Esq.
Jennifer Gellie, Esq.
Colleen Garcia, Esq.
Assistant U.S. Attorneys

/s/

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